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(sub)

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LOUIS BALESTRACCI, JEAN *
 BONVILLE, ANDREW CARR, ROBERT *
 COMEAU, LEO CONELLY, JR., *
 JOHN CORCORAN, THOMAS DEARN, *
 RICHARD ELDREDGE, RICHARD *
 FLETCHER, BRIAN HAWKESWORTH, *
 BEAUFORD HUNT, ROBERT LAWRENCE, *
 JOSEPH LOPES, DAVID MANN, *
 GARY MEYN, RUSSELL NICKERSON, *
 DIANE OWENS, ERNEST QUINTIN, *
 DONNA RENE, JOSEPH SOCHA, STEPHEN *
 WATTS, and DUNSTAN WHITLOCK, *

Civil Action No. 04-11103-EFH

Plaintiffs,

v.

NSTAR ELECTRIC & GAS CORPORATION,

Defendant

**JOINT MOTION TO CONTINUE DISCOVERY
AND OTHER CASE DEADLINES**

Plaintiffs Louis Balestracci, et al. (collectively referred to as "Plaintiffs"), and Defendant NSTAR Electric and Gas Corporation ("NSTAR"), jointly move that the deadline for completing all discovery (including production of expert reports and completion of expert depositions) be continued from November 15, 2004 to and including December 10, 2004, and that the deadline for filing dispositive motions be continued to and including January 14, 2005. The grounds for this motion are as follows:

1. This is an action by Plaintiff retirees who were management employees at the time of their retirement from NSTAR and its predecessors. The Plaintiffs challenge modifications to

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 Edward F. Harrington, S.P.J.

retiree dental benefits implemented in 2003.

2. The parties are requesting this brief extension in order to allow for the completion of all discovery, and the orderly filing of dispositive motions. An identical motion is being filed in the related action of Charles J. Senior, et al. v. NSTAR Electric and Gas Corporation, Civil Action No. 04-10160-EFH.

WHEREFORE, the parties pray that this motion be allowed, and that the deadline for completing discovery be continued to and including December 10, 2004, and that the deadline for filing dispositive motions be continued to and including January 14, 2005.

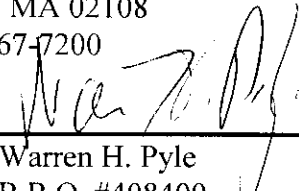
Respectfully submitted,

LOUIS BALESTRACCI, et al.,

By their Attorneys,

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By:


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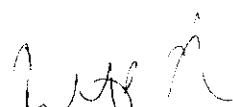
Respectfully submitted,

NSTAR ELECTRIC AND GAS
CORPORATION,

By its Attorneys,

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B.B.O. #546052

Dated: October 21, 2004

Dated: October 21, 2004